

## **REMARKS**

Claims 1-19 are pending in the present application. The Examiner has maintained the rejections of claims 1-11, 14-15, and 17-19 under 35 U.S.C. §102, and claims 12-13 and 16 under 35 U.S.C. §103. Applicant has amended claims 1, 14, and 15, and has canceled claim 2. No new matter has been introduced.

### **Section 102 Rejections**

Claims 1-11, 14-15, and 17-19 were rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,219,045 (Leahy, et al.).

Applicant urges that independent claims 1, 14, and 15 are not anticipated by Leahy for at least the reasons presented herein below.

At the very least, Leahy does not disclose or suggest a virtual environment system that recites, e.g., an *acoustic localizer comprising a plurality of microphones arrayed to span the three coordinate axes of a three dimensional space*, as essentially recited in claims 1, 14, and 15.

Leahy is directed to a network architecture for a chat room. Leahy's system includes one or more client systems through which each user interacts, and each client system includes a GUI that displays a visual representation of the chat room, including avatars representing at least some of the participants to a given user. Leahy's client systems are desktop computers, terminals, dedicated game controllers workstations, or similar devices with graphical displays and use input devices. Leahy's system also includes a chat processor that can send and receive messages containing conversation. Although these messages can contain text and/or audio, there is no disclosure in Leahy of an acoustic localizer that can determine the location of a sound source in a local environment. A microphone is included among Leahy's input devices, however, there is no disclosure or suggestion of a plurality of microphones spanning the coordinate axes of a three dimensional space to unambiguously estimate a sound source location in three

dimensions. Since Leahy's client systems are essentially personal computers or similar devices, as opposed to the head mounted audio/video display as used in virtual reality systems, the only microphone suggested in Leahy is a microphone one would find attached to the computer system's sound board.

For the reasons presented above, Applicant urges that Leahy does not anticipate Applicant's claims 1, 14, and 15. Reconsideration and withdrawal of these rejections are respectfully requested.

Claims 3-11 depend from claim 1, and claims 17-19 depend from claim 15, and are thus patentable for the same reasons as claims 1 and 15, respectively. Reconsideration and withdrawal of these rejections are respectfully requested.

### **Section 103 Rejections**

Claims 12-13 and 16 were rejected under 35 U.S.C. §103(a) as being obvious over Leahy in view of U.S. Patent No. 6,584,439 (Geilhufe, *et al.*).

Claims 12-13 depend from claim 1, and claim 16 depends from claim 15. Claim 12 is directed to an I/O device wherein "operations . . . are commanded by said user through voice commands. Claim 13 includes "a speech recognition module adapted to translate voice commands for said user . . .". Claim 16 is directed to a method wherein "said . . . I/O device . . . is controlled by . . . voice commands from said user . . .". The Action concedes that Leahy does not teach voice commands, but then cites Geilhufe as teaching a GUI that uses voice commands to control input from a user. However, as discussed above, Leahy fails to teach or suggest an *acoustic localizer comprising a plurality of microphones arrayed to span the three coordinate axes of a three dimensional space*, as recited in independent claims 1 and 15, and Geilhufe does not correct these deficiencies. Applicant urges that a *prima facie* case of obviousness against dependent claims 12-13 and 16 cannot be maintained based on the combination of Leahy and Geilhufe. Reconsideration and withdrawal of these section 103 rejections are respectfully requested.

## CONCLUSION

Applicant urges that claims 1 and 3-19 are in condition for allowance for at least the reasons stated. Early and favorable action on this case is respectfully requested.

Respectfully Submitted,

Date: 9/29/2005

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